

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA	§	
VS.	§	NO. 4:20CR00212
DEBRA MERCER-ERWIN	§	

**DEFENDANT DEBRA MERCER-ERWIN'S UNOPPOSED
MOTION TO MODIFY CONDITIONS OF PRE-TRIAL RELEASE**

TO THE HONORABLE JUDGE OF THE COURT:

The Defendant in the above styled and numbered cause, DEBRA MERCER-ERWIN, respectfully moves the Court for an order modifying the conditions of pre-trial release of the Defendant. In support of this motion, DEBRA MERCER-ERWIN would show the Court as follows:

I.

The Defendant was placed on conditions of release on December 30, 2020. One of her conditions, 7(q) requires her to submit to a location monitoring as directed by the pretrial services office or supervising officer.... Counsel for the Defendant has conferred with the Government and the Government is unopposed to the removal of the GPS leg monitor. Counsel has also conferred with Pre Trial Services (Ms. Tiffany Routh) who stated that she was unopposed knowing that the Government was unopposed. The Defendant has been complying with the conditions of pretrial release, and has not been in violations of any conditions.

II. Certificate.

Counsel for the Defendant conferred with Assistant United States Attorney, Ernest

Gonzalez, about this motion on February 3, 2021. The Government is not opposed to this motion.

In addition, Pre Trail Services Tiffany Routh, is also unopposed.

III.

WHEREFORE, PREMISES CONSIDERED, Debra Mercer-Erwin prays that the Court enter an order modifying Defendant's condition of the GPS leg monitor by removing the GPS leg monitor.

Respectfully Submitted,

By: /s/ Rafael de la Garza
RAFAEL DE LA GARZA
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Attorney for the Defendant,
DEBRA MERECER-ERWIN

CERTIFICATE OF SERVICE

I certify that a true and exact copy of the Defendant Debra Mercer-Erwin's Motion to Modify Conditions of Pretrial Release was sent to Assistant United States Attorney, Ernest Gonzalez, on the February 4, 2021.

Dated 2/04/21

By: /s/Rafael de la Garza
RAFAEL DE LA GARZA

CERTIFICATE OF CONFERENCE

On the February 3, I conferred with AUSA Gonzalez. He does not oppose this motion. On February 4, 2021, I conferred with Pre Trial Services Officer Tiffany Routh. She does not oppose this motion.

DATED: 2/04/21

/s/ Rafael de la Garza II
Rafael De La Garza
Attorney for Defendant